COUNTY OF SUFFOLK

ROBERT J. GAFFNEY
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF HEALTH SERVICES

MARY E. HIBBERD, M.D., M.P.H.
COMMISSIONER

November 18, 1992

Debra L. Felton, P.E.
Naval Facilities Engineering Command
Department of the Navy, Northern Division
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Dear Ms. Felton:

RE: DRAFT RCRA FACILITY ASSESSMENT WORK PLAN, NWIRP CALVERTON

On behalf of the Suffolk County Department of Health Services, I would like to offer the following comments and suggestions on the draft RCRA Facility Assessment Sampling Visit Work Plan for the Naval Weapons Industrial Reserve Plant, Calverton, New York prepared by Halliburton NUS Environmental Corp. (November 1992):

1) Coal Pile Storage Area: Since the direction of groundwater flow in this area is probably ESE to ENE, it would be preferable to locate both CP-SB09 and CP-SB11 close to the remaining pile in these directions to obtain the maximum information from the soil boring samples to be taken at the water table.

2) ECM Area: The direction of shallow groundwater flow in this area is ENE, based on water table elevation data collected by the SCDHS at the test facility outside the fence (not ESE, as stated in Section 4.3.2.3). Given that the highest TCA concentration was found in SCDHS well MW-7 (Figure 4-2), boring ECM-SB03 should be moved to a location in between the former solvent storage location and MW-7, and a groundwater well should be installed at this location (screened 0'-10' below the water table).

   The discussion of groundwater sampling at the ECM site (page 38) refers to existing wells, while Figure 4-2 indicates only one supply well on site; this discrepancy should be corrected. Also, samples should be collected at a point in the system before the storage tank, if one is present.

3) Cesspool/Leach Field Areas: The area of primary concern to the SCDHS is the old, abandoned leach field for the Sewage Treatment Plant located near the south gate (since organics were detected in SCDHS monitoring well S-51591 located approximately downgradient of this area); it is not clear from the text, Figure 1-3, or Table 4-4 that this area will be addressed.

The procedure for identifying disposal systems, and the rationale for selecting those to be sampled, need to be described. It is important that old site plans and the histories of each building be considered, even if current use would not indicate a potential for industrial discharges. In addition, floor drains from every building need to be traced, and roof drains need to be checked for interconnections with waste discharge pipes; pools connected to such systems should be investigated.

The proposed soil gas surveys would only identify VOCs, while possibly missing semivolatile organics and metals. It is recommended that all pools identified as possible present or historic points of contamination discharge be uncovered and the contents inside be sampled down through the bottom. The work plan should also provide that groundwater monitoring wells be installed wherever significant contamination is detected.

4) Investigation of McKay Lake: The draft work plan does not include an investigation of McKay Lake, which the SCDHS has previously requested. Such an investigation should include bottom sediment and fish tissue analyses for the full range of possible contaminants.

5) Fire Training Area: The report does not address additional work needed at the Fire Training Area, including expanded efforts to locate drums alleged to have been buried in the vicinity.

I trust these concerns will be addressed in the final work plan.

Please call me if you would like to discuss these issues further; my telephone number is (516) 853-3196.

Very truly yours,

Sy F. Robbins

Sy F. Robbins, C.P.G., County Hydrogeologist
Division of Environmental Quality